

**BALL JANIK LLP**

**A T T O R N E Y S**

**1455 F STREET, NW, SUITE 225  
WASHINGTON, D.C. 20005**

**www.balljanik.com**

**TELEPHONE 202-638-3307**

**FACSIMILE 202-783-6947**

**KARL MORELL**

**kmorell@dc.bjllp.com**

**February 10, 2011**

**E-File**

**ENTERED  
Office of Proceedings**

**FEB 10 2011**

**Part of  
Public Record**

**Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street S.W.  
Washington, DC 20423-0001**

**Re: STB Finance Docket No. 35410, Adrian & Blissfield Rail Road  
Company – Continuance in Control Exemption – Jackson &  
Lansing Railroad Company**

**228806**

**STB Finance Docket No. 35411, Jackson & Lansing Railroad  
Company – Lease and Operation Exemption – Norfolk Southern  
Railway Company**

**STB Finance Docket No. 35418, Jackson & Lansing Railroad  
Company – Trackage Rights Exemption – Norfolk Southern  
Railway Company**

**Dear Ms. Brown:**

**By decision served December 28, 2010, the Surface Transportation Board ("Board") instituted a proceeding in the above-referenced proceedings. The Board invited comments from interested parties on the effect of the involved transactions on competition and shippers. Commenters were also invited to address safety and employee-interest issues.**

**Adrian & Blissfield Rail Road Company and Jackson & Lansing Railroad Company ("JAIL") hereby submit the attached comments of Louis Padnos Iron & Metal Company ("Padnos"), JAIL's third largest customer by volume.**

February 10, 2011  
Page 2

Padnos welcomes JAIL's customer centric services. Padnos also notes that, as a locally based carrier, JAIL will be able to more directly focus on its service needs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Karl Morell". The signature is fluid and cursive, with the first name "Karl" being more prominent than the last name "Morell".

Karl Morell

Enclosure

cc: All parties of record.



**LOUIS PADNOS IRON & METAL COMPANY**  
Lansing Division

**February 8, 2011**

**Surface Transportation Board  
395 E Street  
Washington, DC 20423**

**Re: Jackson & Lansing Railroad Company  
FD No. 35410, 35411 and 35418**

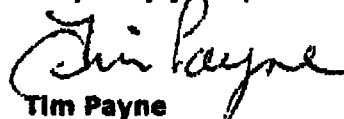
**Dear Sir or Madam:**

**Padnos Iron & Metal Company is a rail customer located along the Jackson & Lansing Railroad Company (JAIL) in Lansing, Michigan. This rail line was formerly operated by Norfolk Southern Railway Company (NS).**

**Padnos welcomes JAIL and the customer centric services which it proposes to offer. In our business, spot sales of materials are important. Spot prices fluctuate by the day. Our having to wait for empty gondola cars in order to ship out purchased materials can often result in lost sales opportunities to us. When we order empty gondola cars from NS, we will sometimes have to wait 2 weeks or more for the cars to arrive. JAIL has come to us and demonstrated how they will be solving our car supply problem. As a result of JAIL's proposed solution, it is our hope to be able to improve our ability to service our customers with material delivery times reduced by 10-14 days.**

**While NS did provide us with reasonable rail service, it is clear that JAIL is able to more directly focus upon our service needs. We welcome the new rail services being provided by JAIL.**

**Very truly yours,**

  
**Tim Payne**